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KOCHAVA, INC.

9
10 UNITED STATES DISTRICT COURT
11
12 NORTHERN DISTRICT OF CALIFORNIA

13 LIVERAMP, INC., a Delaware Corporation,) CASE NO.: 3:19-cv-02158-CRB
14)
14 Plaintiff,) Judge: Honorable Charles R. Breyer
15)
15)
16 vs.) **STIPULATED REQUEST TO EXTEND**
16) **CASE SCHEDULE; ~~PROPOSED~~**
16) **ORDER**
17 KOCHAVA, INC., a Delaware Corporation,)
18)
18 Defendant.)
19)
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21)
22 KOCHAVA, INC., a Delaware Corporation,)
22)
23 Counterclaimant,)
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24)
25 vs.)
25)
26 LIVERAMP, INC., a Delaware Corporation,)
26)
27 Counter-Defendant.)
28)

1 TO THIS HONORABLE COURT:

2 Pursuant to Civil Local Rules 6-1, 6-2 and 7-12, Plaintiff and Counter-Defendant
3 LiveRamp, Inc. (“LiveRamp”) and Defendant and Counterclaimant Kochava, Inc. (“Kochava”)
4 (collectively, the “Parties”) respectfully submit this stipulated request to extend the case schedule
5 in this matter by ninety (90) days for good cause. The Parties seek the requested extensions due
6 to ongoing settlement discussions, as further explained below.

7 WHEREAS, the Parties submitted a Joint Case Management Conference Statement on
8 February 7, 2020, with an agreed case schedule (Dkt. 71);

9 WHEREAS, the Court adopted the agreed case schedule contained in the Joint Case
10 Management Conference Statement on February 14, 2020 (Dkt. 73);

11 WHEREAS the Parties previously stipulated to extend the case schedule due to the
12 unavailability of in-person depositions caused by the current COVID-19 pandemic (Dkt. 90);

13 WHEREAS this Court granted the prior stipulation to extend the case schedule (Dkt. 91);

14 WHEREAS discovery has been significantly delayed and hampered due to the COVID-
15 19 pandemic, inclusive of the lack of availability of witnesses, among other concerns; stemming
16 partially from such issues, the Parties have been engaged in significant late stage settlement
17 discussions wherein the Parties have, in their view appropriately, expended resources toward
18 resolution in lieu of expenditures of the significant time and expense discovery in this case will
19 further entail;

20 WHEREAS a proposed settlement agreement has been exchanged, and is currently under
21 review with Plaintiff;

22 NOW THEREFORE, the Parties hereby STIPULATE and AGREE to continue the
23 current case schedule by approximately ninety (90) days, as follows:

1 2 3 4 5 6 7 8 9 10 11 12 13 14 15	EVENT	CURRENT DEADLINE/DATE	STIPULATED DEADLINE/DATE
	Cutoff to Serve Written Fact Discovery	April 14, 2021	July 13, 2021
	Exchange of Expert Reports	June 14, 2021	September 13, 2021
	Rebuttal Expert Reports	July 14, 2021	October 12, 2021
	Close of Discovery	August 17, 2021	November 15, 2021
	Deadline for Filing Dispositive and Daubert Motions	September 14, 2021	December 13, 2021
	Status Conference by Zoom	December 11, 2020	March 11, 2021 March 12, 2021
	Joint Status Report Due	December 4, 2020	March 4, 2021

16 IT IS SO STIPULATED.

17 Respectfully submitted,

18 Dated: November 9, 2020

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20 GORDON REES SCULLY MANSUKHANI,
21 LLP

22 By: /s/ Craig J. Mariam
23 Craig J. Mariam
Hazel Mae B. Pangan
Samuel B. Laughlin
24 Attorneys for Defendant and
Counterclaimant KOCHAVA, INC.

1 Dated: November 6, 2020

WILSON SONSINI GOODRICH & ROSATI, P

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3 By: /s/ Shelby Pasarell Tsai
4 Tonia Ouellette Klausner
5 Shelby Pasarell Tsai
6 Attorneys for Plaintiff and Counter-
7 Defendant LIVERAMP, INC.

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10 **ATTESTATION**

11 I hereby attest that the other signatories listed, on whose behalf the filing of this
12 stipulation is submitted, concur in the filing's content and have authorized the filing.

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/s/ Craig J. Mariam
Craig J. Mariam

~~[PROPOSED]~~ ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

EVENT	CURRENT DEADLINE/DATE	STIPULATED DEADLINE/DATE
Cutoff to Serve Written Fact Discovery	April 14, 2021	July 13, 2021
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Joint Status Report Due	December 4, 2020	March 4, 2021

Dated: November 10, 2020

Honorable Charles R. Breyer
UNITED STATES DISTRICT JUDGE